2 2 3 4 5 5 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6	Ruzanna Poghosyan. #256477 RP DEFENSE LAW, APC 16861 Ventura Blvd. Suite 305 Encino, CA 91436 Tel: 818-646-3443 Fax: 818-351-8235 Email: ruzanna@rpcriminaldefense.com Attorney for Defendant SIMEON HERNANDEZ-ORTIZ		
7	IN THE UNITED STATES DISTRICT COURT		
3	FOR THE EASTERN DISTRICT OF CALIFORNIA		
)	UNITED STATES OF AMERICA,) Case No. 1:20-cr-00039-DAD-BAM	
0	Plaintiff,)) STIPULATION TO CONTINUE DEFENDANT'S) MOTION TO SUPPRESS AND ORDER THEREON	
12 13	vs. SIMEON HERNANDEZ-ORTIZ Defendants.) Date: June 14, 2021 Time: 10:00 a.m. Judge: Hon. Dale A. Drozd)	
14 15 16 17 18 19 20 21	The United States of America, by and through PHILLIP A. TALBERT, Acting United States Attorney, and KIMBERLY SANCHEZ, Assistant United States Attorneys, and the defendant, by and through his respective attorney of record, hereby stipulate to continue the defendant's motion to suppress in this case from June 14, 2021 at 10:00 am until July 12, 202 10:00 a.m. The government's response will be filed two weeks before the hearing. The defendant's reply, if any, shall be filed one week before the hearing. This request is made to permit the parties to fully explore the possibility of a plea before litigating the suppression motion.		
23 24	Dated: June 4, 2021	PHILLIP A. TALBERT Acting United States Attorney	
25 26 27		/s/ Kimberly Sanchez KIMBERLY SANCHEZ Assistant United States Attorney	

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1	Dated: June 4, 2021 RUZANNA POGHOSYAN	
2	RP DEFENSE LAW, APC	
3	/s/ Ruzanna Poghosyan	
4	RUZANNA POGHOSYAN Attorney for	
5	SIMEON HERNANDEZ-ORTIZ	
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7	<u>ORDER</u>	
8	IT IS HEREBY ORDERED that the hearing on defendant's motion to suppress shall be	
9	continued from June 14, 2021 until July 12, 2021 at 10:00 a.m. The government's response shall	
10	be filed two weeks before that date and the defendant's reply, if again, shall be filed one week	
11	before that date.	
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13	IT IS SO ORDERED.	
14	Dated: June 7, 2021	
15	UNITED STATES DISTRICT JUDGE	
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